

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

**Major Mailers Association's First Set Of  
Interrogatories To The United States Postal Service**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following interrogatories to the United States Postal Service: **MMA/USPS-1.**

Respectfully submitted,

**Major Mailers Association**

By: 

Michael W. Hall  
34693 Bloomfield Road  
Round Hill, Virginia 20141  
540-554-8880

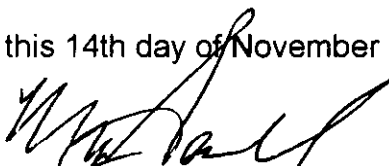
Counsel for  
**Major Mailers Association**

Dated: Round Hill, VA  
November 14, 2001

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with the Commission's Rules of Practice.

Dated this 14th day of November 2001.

  
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Michael W. Hall

**Major Mailers Association's First Set Of Interrogatories  
To The United States Postal Service**

**MMA/USPS-1** Please refer to the USPS institutional response to Part E of Interrogatory MMA/USPS-T22-7, which describes why the Postal Service believes the cost pools for "MODS99, 1SUPP\_F1" and "MODS, 1SUPP\_F4" are not applicable or relevant, and Part D of the response to the same interrogatory.

- A. Please explain why in this proceeding the costs for (1) "MODS18, 1MISC" and "MODS 18, 1SUPPORT" are provided in 1suppf1 and (2) "MODS 48, LD48 OTH" and "MODS 48, LD48\_ADM" are provided in 1suppf4, and are treated differently from the way the Commission treated them in Docket No. R2000-1, as shown in the response to Part D.
- B. Please explain why the costs for (1) "MODS18, 1MISC" and "MODS 18, 1SUPPORT" are provided in for 1suppf1 and (2) "MODS 48, LD48 OTH" and "MODS 48, LD48\_ADM" are provided in 1suppf4, as shown on page 8 of Library Reference USPS-LR-J-84, but are not reported as such on page 8 of Library Reference USPS-LR-J-60.
- C. Please confirm that USPS witness Miller's proposed cost savings would increase by approximately 16% to 18% for each First-Class Automation rate category, if the Commission assumes that labor costs vary 100% with volume, as it has done for 30 years. If you cannot confirm, please explain.